

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	:	<b>CRIMINAL NO. <u>10-_____</u></b>
<b>v.</b>	:	<b>DATE FILED: <u>July , 2010</u></b>
<b>DONALD SENIOR, a/k/a "Delroy Lawrence"</b>	:	<b>VIOLATIONS:</b>
	:	<b>8 U.S.C. § 1326(a) (reentry</b>
	:	<b>after deportation - 1 count)</b>
	:	<b>18 U.S.C. § 911 (false claim to United</b>
	:	<b>States citizenship - 1 count)</b>
	:	<b>18 U.S.C. § 1001 (false statements - 1</b>
	:	<b>count)</b>

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

On or about June 14, 2010, in the Eastern District of Pennsylvania, defendant

**DONALD SENIOR,  
a/k/a "Delroy Lawrence,"**

an alien, and native and citizen of Jamaica, who had previously been deported and removed from the United States on or about August 21, 2000, was found in the United States, having knowingly and unlawfully reentered the United States without first applying to the Attorney General of the United States or his successor, the Secretary for Homeland Security (Title 6, United States Code, Sections 202(3), (4) and 557), for permission to reapply for admission, and without receiving in response the express consent of the Attorney General or his successor to reapply for admission.

In violation of Title 8, United States Code, Section 1326(a).

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about June 14, 2010, in the Eastern District of Pennsylvania, defendant

**DONALD SENIOR,  
a/k/a “Delroy Lawrence,”**

an alien, and a native and citizen of Jamaica, falsely and willfully represented himself to be a citizen of the United States.

In violation of Title 18, United States Code, Section 911.

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about June 14, 2010 in the Eastern District of Pennsylvania, defendant

**DONALD SENIOR,  
a/k/a “Delroy Lawrence”,**

in a matter within the jurisdiction of the Department of Homeland Security, Bureau of Immigration and Customs Enforcement, an agency of the executive branch of the United States, knowingly and willfully made materially false, fictitious, and fraudulent statements and representations in that defendant SENIOR claimed to be a United States citizen due to his birth in the United States Virgin Islands, when, as defendant knew, he was an alien, and a native and citizen of Jamaica.

In violation of Title 18, United States Code, Section 1001.

**A TRUE BILL:**

\_\_\_\_\_  
**FOREPERSON**

\_\_\_\_\_  
**ZANE DAVID MEMEGER**  
**United States Attorney**